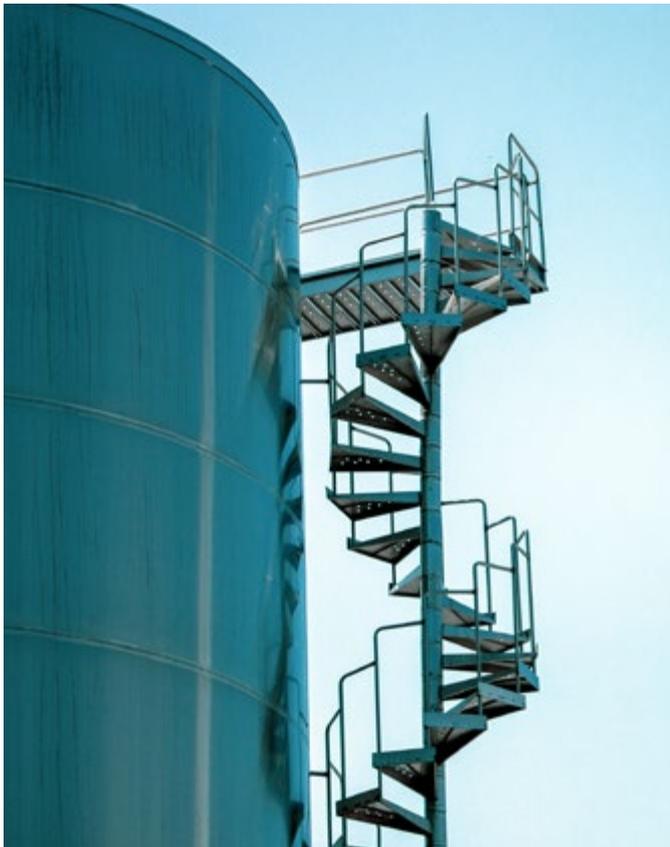


2020

UPEI
ANNUAL
REPORT

RETHINK
THE ENERGY
SECTOR



UPEI represents European importers and wholesale/retail distributors of energy for the transport and heating sectors, supplying Europe's customers, independently of the major oil companies and energy producers.

Independent suppliers, covering more than a third of Europe's demand, play a crucial role in an evolving market by bringing competition which is vital to the economy. Their independence enables them to respond rapidly to changes in terms of market structure, products and services, contributing to security of supply on a local, regional and national level while embracing new, cost effective solutions which further promote energy efficiency and reduce pollutants and emissions.

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PRESIDENT'S FOREWORD



Only few months before the COVID-19 crisis hit our society, the European Commission President Ursula von der Leyen had announced the European Green Deal. Powering a climate neutral Europe requires a fundamental transformation of our energy system, based on improved efficiency and the use of renewable sources. The delivery of the Deal was never meant to be simple, and now, as we face the consequences of the recession caused by COVID-19, it may be the greatest challenge of our time. The pandemic has altered our society permanently and significantly reshaped the way that consumers, industries, and businesses operate.

The unprecedented global shutdown that resulted from the COVID health crisis has forced an urgent reconsideration of transport, considering its central role and contribution to post-COVID economic recovery. According to the Sustainable and Smart Mobility strategy published on 9 December 2020: "Greening mobility must be the new licence for the transport sector to grow".

The reshaping of the fuel supply sector, inaugurated by the Green Deal and accelerated by the pandemic, can be nevertheless seen as a beacon of hope. Its potential lays in the opportunity, for all of us together, to make sure that the ambitious objectives set to face climate

change are met, and that the policies addressing it are taking shape responding to the urgent need to reduce emissions in the transport and the heating & cooling sectors, above all, while reflecting on the challenge for the industry and the market opportunities, together with the needs of the consumers.

As we set our sights to a global recovery, in our lives and in our sector, we are continuing our work, by supporting a green transition (literally) fuelled by today's and tomorrow's technologies and by promoting a level playing field. This is our call on policy makers: build consistency between policies, with the aim of addressing regulatory inconsistencies; facilitate the introduction of cleaner energy but adopt a technology neutral approach; build links between industry and consumers, policymakers and investors, to ensure an accessible and affordable market.

This is what we, as UPEI, have advocated during 2020, engaging with the European institutions, contributing to various consultations, and working with like-minded stakeholders to spread the independent fuel suppliers' messages and priorities. It was encouraging to see that UPEI remained so proactive, effective and relevant in 2020, despite all the challenges, and we look forward to building on these strong foundations in 2021 and beyond.

«
This time of disruption has opened up opportunities to rethink the way we move and we consume energy, which will translate into policy initiatives at national and European level.
 »

Brian Worrall



ABOUT UPEI



STRUCTURE OF UPEI

UPEI PRESIDING BOARD AND EXPERTS



BRIAN WORRALL
(DCC, Ireland)
PRESIDENT
FUEL PAYMENTS | RETAIL HEATING COMMISSIONS



Anna Bes
(UPI, Spain)
VICE PRESIDENT
RETAIL STATIONS COMMISSION



Matthias Plötzke
(MEW, Germany)
VICE PRESIDENT



Johan Deleu
(BRAFCO, Belgium)
VICE PRESIDENT
IMPORT | TRADING | WHOLESALE COMMISSION



Erik de Vries
(NOVE, The Netherlands)
VICE PRESIDENT
BUNKERING COMMISSION

UPEI SECRETARIAT



Cécile Nourigat
SECRETARY GENERAL



Alice Di Pace
COMMUNICATIONS AND OFFICE MANAGER

UPEI EXPERTS



Maximilian Brockmann
COMPULSORY STOCKS OF OIL



Johan Deleu
SUSTAINABLE TRANSPORT



Erik de Vries
MARITIME TRANSPORT



Ondřej Jančařík
FUEL CARDS



Teresa Sayers
FUEL LABELLING



Sarah Schmitt
RETAIL SECTOR



Inga Tölke
TAXATION



Uta Weiss
FUEL QUALITY AND BIOFUELS



Brian Worrall
HEATING OIL

UPEI HEADQUARTERS

As agreed during the UPEI General Meeting on 25 June 2020, the process regarding the immigration of UPEI headquarters from Paris to Brussels and the conversion of the association into a Belgian International Non Profit Association (INPA), as well as the related modifications of UPEI Statutes, has been completed and officialised by the royal decree on 4 November 2020.



UPEI COMMISSIONS

UPEI covers a wide spectrum of downstream activities. In order to address all the topics and issues identified at the business level by the membership, as well as developments at EU policy level that affect the business, five Commissions were created – one for each of the main business activities of UPEI membership.

BUNKERING COMMISSION



- Decarbonisation
- Fuel quality
- Sustainable fuels
- Taxation
- Emission Trading Scheme

2
MEETINGS

RETAIL HEATING COMMISSION



- Energy efficiency
- Building legislation
- Bio heating oil

3
MEETINGS

IMPORT / TRADING / WHOLESALE COMMISSION



- Biofuels
- Compulsory stocks obligation
- Energy taxation
- Fuel quality
- Emission Trading Scheme

2
MEETINGS

RETAIL STATIONS COMMISSION



- Alternative fuels infrastructure
- Fuel labelling, blends and additives
- Technical regulations for stations
- Trends in retail sector

2
MEETINGS

FUEL PAYMENTS COMMISSION

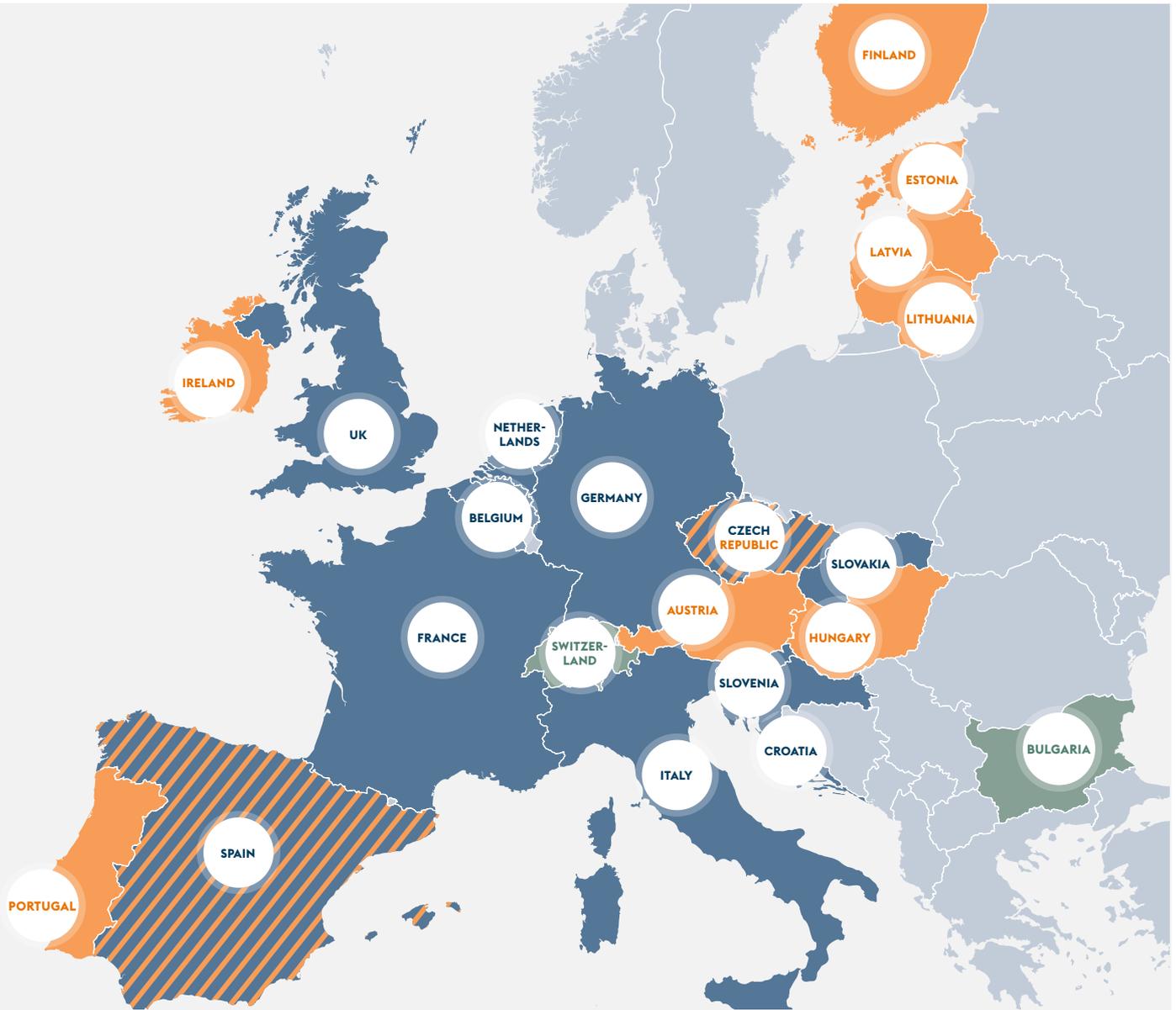


- Fuel cards and apps
- Payment services legislation
- Fraud
- Innovation
- Trends in the payment area

1
MEETINGS

= 10 commission meetings in 2020





NATIONAL ASSOCIATIONS

BELGIUM

Brafco - www.brafco.be

CROATIA

HUP - www.hup.hr

CZECH REPUBLIC

SČS - www.scs.cz

FRANCE

FFPI - www.ffpi.fr

GERMANY

MEW - www.mew-verband.de

ITALY

ASSOPETROLI – ASSOENERGIA
www.assopetroli.it

THE NETHERLANDS

NOVE - www.nove.nl

SLOVAKIA

SČSSR - www.scssr.sk

SLOVENIA

SNNK-WPC - www.snnk-wpc.si

SPAIN

UPI - www.petrolosindependientes.es

UK

DFA - www.downstreamfuel.org.uk



COMPANIES

AUSTRIA

Stiglechner - www.stiglechner.com

CZECH REPUBLIC

W.A.G. Payment Solutions a.s.
www.eurowag.com

ESTONIA

Olerex AS - www.olerex.ee

FINLAND

SEO - www.seo.fi

HUNGARY

Mabanaft Hungary Kft - www.mabanaft.hu

IRELAND

DCC Energy Limited - www.dcc.ie

LATVIA

AS VIRŠI-A - www.virsia.lv

LITHUANIA

UAB Gelybye (Lithuania)
www.facebook.com/gelybye/

PORTUGAL

PRIO Energy - www.prio.pt/en/

SPAIN

OnTurtle - www.onturtle.eu/en/
Andamur - www.andamur.com



ASSOCIATES

BULGARIA

Benzin Bg - www.benzin.bg

SWITZERLAND

AVIA International
www.avia-international.com



CONTEXT

THE EU POLICY CONTEXT IN 2020

UPDATED MULTIANNUAL FINANCIAL FRAMEWORK AND NEXT GENERATION RECOVERY INSTRUMENT

The COVID-19 pandemic has shaken Europe and the world to its core, testing healthcare and welfare systems, our societies and economies and our way of living and working together. As a response, the European Commission has put forward, during spring 2020, its [proposal](#) for a major recovery plan, aiming to harness the full potential of the EU budget.

On 27 May 2020, the Commission released its update of the [EU budget and the Economic Recovery Plan](#) needed to combat the recession caused by the COVID outbreak. With this recovery plan/instrument, now being referred to as the Next Generation EU instrument, the total financial muscle of the EU budget has been increased to €1.85 trillion. The Commission outlined three parts of its updated

EU budget, which is meant to help ease the economic downturn and transition the EU towards a sustainable, digital and resilient economy.

The update is constituted from a revised Multiannual Financial Framework 2021-2027 (€1.1 trillion), the temporary Next Generation EU recovery instrument worth €750 billion, and the €540 billion package of stopgap measures for liquidity and unemployment guarantees adopted in spring. The Next Generation EU instrument itself is based on three pillars, which are all designed to support the three main goals of the Commission's recovery efforts – supporting the green recovery, enhancing the digital transition, and making the EU more economically resilient and strategically autonomous.

INVESTING IN A GREEN, DIGITAL AND RESILIENT EUROPE

SUPPORTING MEMBER STATES TO RECOVER

- Recovery and Resilience Facility
- Recovery Assistance for Cohesion and the Territories of Europe - REACT-EU
- Reinforced rural development programmes
- Reinforced Just Transition Mechanism



Within European Semester framework:

- Supporting investments and reforms
- Supporting a just transition

KICK-STARTING THE ECONOMY AND HELPING PRIVATE INVESTMENT

- Solvency Support Instrument
- Strategic Investment Facility
- Strengthened InvestEU programme



- Supporting key sectors and technologies
- Investing in key value chains
- Solvency support for viable companies

LEARNING THE LESSONS FROM THE CRISIS

- New Health programme
- Reinforced rescEU
- Reinforced programmes for research, innovation and external action



- Supporting key programmes for future crises
- Supporting global partners

The final agreement on the EU Recovery Plan was reached by European Heads of State and of Government on 21 July 2020. It represented a compromise between EU Member States such as Spain, Italy, France and Germany, which had called for an ambitious EU recovery package, and the so-called "Frugal Four" – Austria, the Netherlands, Sweden and Denmark – that were less keen on the idea of providing grants. According to the agreement, the budget of the Recovery

Instrument remains at €750 billion, but includes a new ratio between grants and loans: €390 billion will be disbursed in the form of grants and €360 billion will be available as loans.

EU leaders also agreed on the governance of the Recovery Instrument. Member States would need to present their national reform plans for an assessment by the Commission.

ADJUSTED COMMISSION WORK PROGRAMME 2020

Given the crisis caused by the COVID-19 pandemic, the Commission also reviewed its work programme for 2020. Following its proposal for a major recovery plan, on 27 May 2020 the Commission unveiled its adjusted Work Programme for 2020, which prioritises the actions needed to propel Europe's recovery and resilience. Climate policies remain broadly on track, as the Commission has chosen not to delay most of the main legislative proposals.

To recall, on 11 December 2019, the European Commission President Ursula von der Leyen had presented [the European Green Deal](#), the ambitious package of measures ranging from ambitiously cutting greenhouse gas emissions, to investing in cutting-edge research and innovation, to preserving Europe's natural environment. The Green Deal, as a cross-cutting plan impacting many



economic sectors and industries, is at the heart of the EU's recovery strategy.

In particular, the first climate action initiatives under the Green Deal include:

- European Climate Law to enshrine the 2050 climate-neutrality objective into EU law
- 2030 Climate Target Plan to further reduce net greenhouse gas emissions by at least 55% by 2030
- European Climate Pact to engage citizens and all parts of society in climate action.

EUROPEAN CLIMATE LAW

Published on 4 March 2020, the proposal for a Regulation establishing [climate-neutrality by 2050](#), also known as the Climate Law, set a clear climate-neutrality goal to be collectively achieved by 2050: Union-wide emissions



and removals of greenhouse gases regulated in Union law shall be balanced at the latest by 2050. The proposal mandated the Commission to assess how to increase the current 40% target to a new target of 50 to 55% emission reductions compared to 1990 levels. The proposal also gave the Commission the possibility to adopt, through delegated acts, a clear trajectory to reach climate neutrality by 2050; such trajectory would cover the 2030 to 2050 period. It would also amend the Governance Regulation to include new provisions on how Member States' progress in contributing to the climate-neutrality objective and in meeting the trajectory.

UPEI welcomed the proposal for the Climate Law, which sends a clear signal to market operators. Nonetheless, through several meetings with EU representatives, we recalled that, while it is important to set long-term objectives, Europe should not dismiss solutions that are already available, cost-effective, commercially viable and that positively contribute to the energy transition.

The Regulation is currently under negotiation, with both the European Parliament and the Council proposing amendments to the proposal from the European Commission.



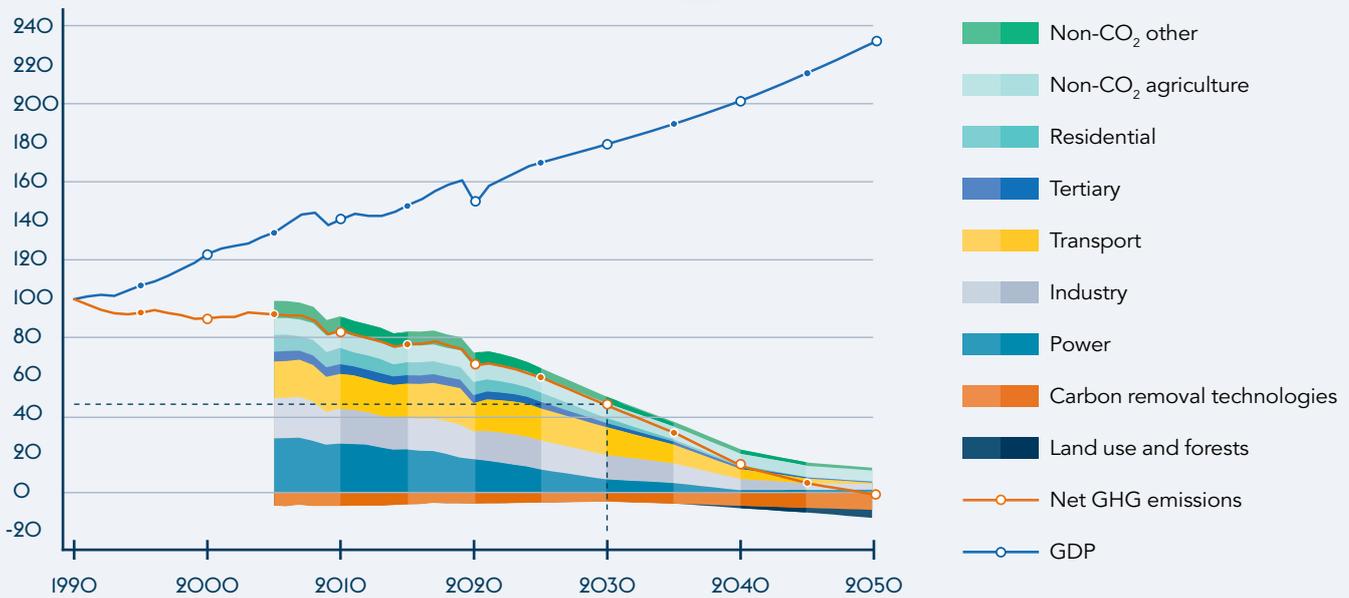
2030 CLIMATE TARGET PLAN

On 17 September 2020, the Commission released its awaited 2030 Climate Target Plan, which outlines an increase of the 2030 target to an “at least 55% including emissions and removals,” compared with 1990 levels, as expected, and more importantly some of the policy means of achieving this increase. The Commission argued that its Impact Assessment identified risks of carbon lock-in in the

coming decade as being too high, both due to the current legislation and short-term economic decisions of private actors, especially in light of the COVID crisis.

Based on current policies and their implementation, the emissions reductions would be between 45-47% by 2030, which is not enough to put Europe on track to reaching carbon neutrality by 2050.

EU CLIMATE TARGET PLAN 2030 - KEY CONTRIBUTORS



ENERGY

(75% of emissions)

- Burning fossil fuels is the largest source of greenhouse gas emissions in the EU
- The energy system plays a central role in the transition to a climate-neutral economy

BUILDINGS

(36% of emissions)

- The building sector is responsible for 40% of final energy use
- This sector has a large and cost-effective potential to become more energy-efficient and reduce emissions

TRANSPORT

- The transport sector has the lowest share of renewable energy use
- It will need to increase its renewable energy share to around 24% by 2030

LAND USE SECTOR

- Nature absorbs CO₂ and is vital to the fight against climate change
- To achieve climate neutrality by 2050, we need to grow our carbon sink to reach 300 million tons CO₂eq by 2030



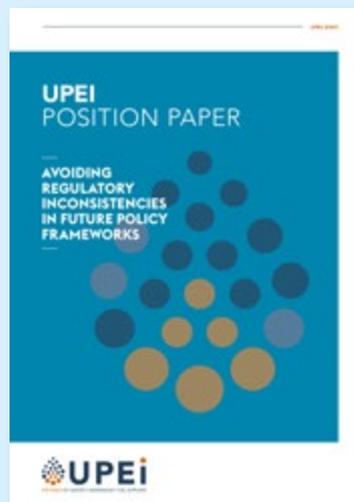
– The Climate Target Plan, and the upcoming legislative proposals, provide a key opportunity to improve the consistency between different pieces of legislation and foster synergies.

The fuel supply sector is indeed subjected to a number of requirements set out by different regulations, which however aim at diverging objectives and are materialised in different obligations. In order to raise awareness on the topic, UPEI published a position paper titled “Avoiding regulatory inconsistencies in future policy frameworks”. This paper was subsequently presented to various departments in the European Commission.

Throughout 2020 UPEI engaged with officials from key Commissioners’ cabinets on behalf of the sector, illustrating challenges on the road to climate neutrality, from ensuring that all policy inconsistencies are fixed to not dismissing readily available solutions, promoting the use of drop-in alternative renewable fuels, and supporting sustainable renewals of fleets based on technology neutrality.

UPEI POSITION PAPER “AVOIDING REGULATORY INCONSISTENCIES IN FUTURE POLICY FRAMEWORKS”

This paper aims at raising awareness on existing regulatory inconsistencies at EU level impacting the fuel supply sector, and proposes solutions for a more effective framework. Inconsistencies can be demonstrated in the particularly problematic relationship between the Fuel Quality Directive (FQD) and the Renewable Energy Directive (REDII), the incomplete support of carbon neutral solutions under the recently adopted CO₂ Standards for Light-Duty Vehicles, and insufficient incentivisation of technology-neutral solutions under the Alternative Fuels Infrastructure Directive (AFID).



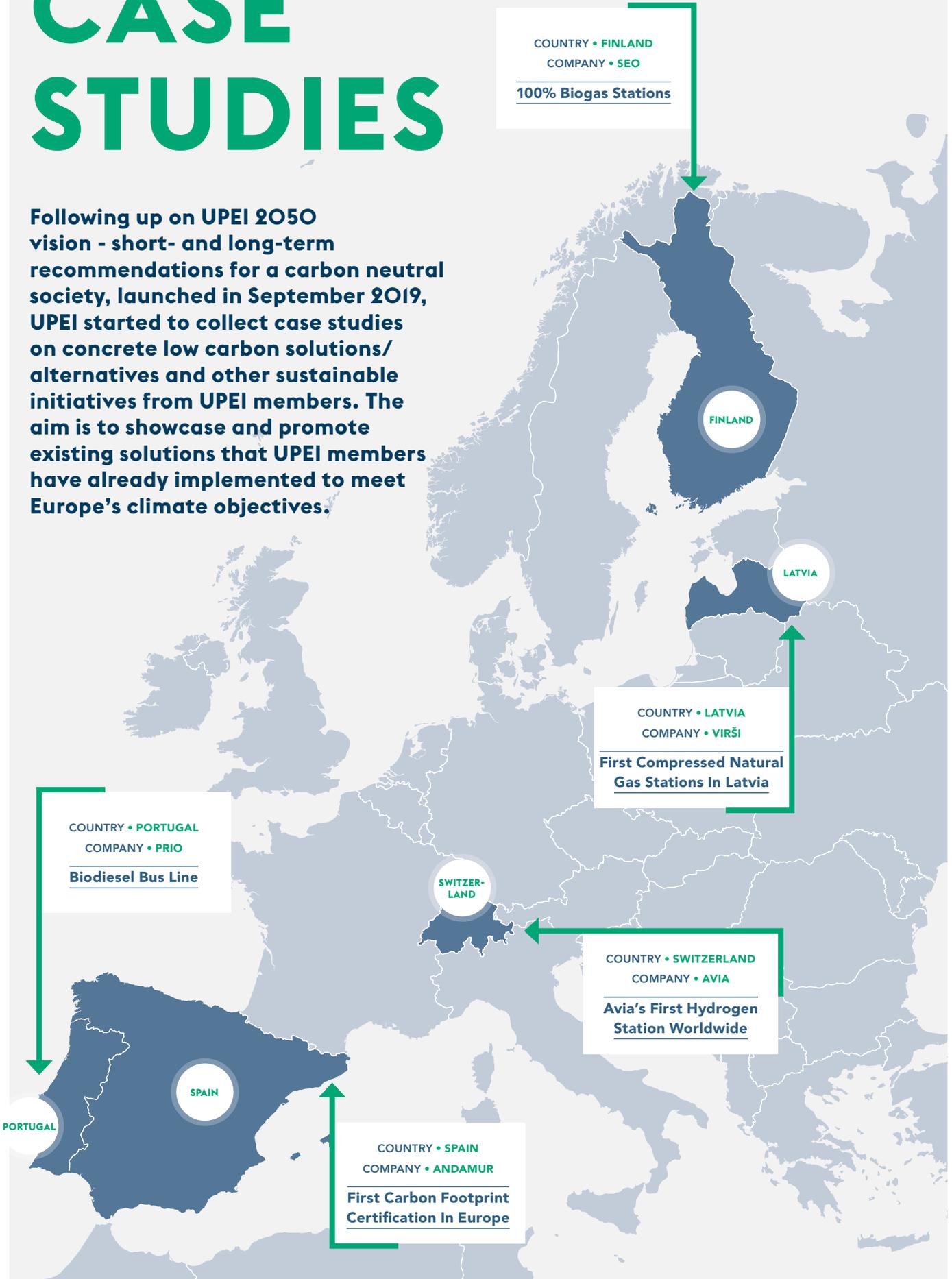


ACTIVITY REPORT 2020



CASE STUDIES

Following up on UPEI 2050 vision - short- and long-term recommendations for a carbon neutral society, launched in September 2019, UPEI started to collect case studies on concrete low carbon solutions/ alternatives and other sustainable initiatives from UPEI members. The aim is to showcase and promote existing solutions that UPEI members have already implemented to meet Europe's climate objectives.



COUNTRY • FINLAND
COMPANY • SEO

First Carbon Footprint Certification In Europe

For Finland to be carbon free in year 2035, the Finnish government has implemented strict policies to address climate change. Specifically, the Finnish Parliament has approved a law that is set to see biofuels targets gradually increase for 2030, which for 2020 is set to 20%.

Committed to achieving this goal, the Finnish company Suomalainen Energiaosuuskunta (SEO) decided to invest in and launch a biogas project, hence becoming the first distributor in Finland to offer biogas besides fossil fuels. The carbon-neutral production process of biogas makes it a 100% renewable energy, representing a concrete solution to the fight against climate change by actively reducing GHG emissions.

TO KNOW MORE [READ HERE](#)



The climate policy pursued by the European Union in recent years has been strongly promoting the use of alternative fuels, resulting in significant developments in the European compressed natural gas (CNG) market. By reorienting towards this emerging product, JSC "Virši-A", the largest domestic fuel trader in Latvia, has set an example of a far-seeing and sustainable business planning, being the first operator to introduce CNG, a previously publicly unavailable but demanded product, in Latvia.

Virši is currently the only operator offering CNG in the country, through its growing network that currently counts three different stations, bringing not only environment benefits, i.e. reducing CO₂ and NOx emissions, but also cost savings to their clients.

TO KNOW MORE [READ HERE](#)

COUNTRY • LATVIA
COMPANY • VIRŠI

First Compressed Natural Gas Stations In Latvia





Road Transportation is responsible for nearly 25% of direct CO₂ emissions in Europe. Road vehicles – cars, trucks, buses and two- and three-wheelers – account for a considerable portion of this value. That is why PRIO, as a leading advanced fuels and biofuels operator in Portugal, and Carris, one of the most important urban fleets operators, decided that it was time to act on this problem and test sustainable solutions for conventional diesel engines. With PRIO's ZERO Diesel, both companies were able to transform 6 conventional buses in 100% renewable and fossil-free means of transportation without changing anything besides the fuel used, proving that is possible to act on climate change and start the energy transition right here and now, with the vehicles of today.

TO KNOW MORE [READ HERE](#) ▶

COUNTRY • PORTUGAL

COMPANY • PRIO

Biodiesel Bus Line



COUNTRY • SPAIN

COMPANY • ANDAMUR

First Carbon Footprint Certification In Europe



The Spanish company Andamur, a family business focusing on en-route services, is the first company in the professional transport sector to obtain, in Europe, the Carbon Footprint Certification (ISO 14064-1, Certificate of Quantification of Emissions and Removals of Greenhouse Gases), granted by the Spanish Association for Standardization and Certification (AENOR). Between 2018 and 2019, Andamur has indeed worked on its own integrated services stations with the implementation of sustainable actions in all areas. The result was a reduction of 30% of carbon footprints emissions compared to the previous year.

TO KNOW MORE [READ HERE](#) ▶

In its contribution to sustainably reducing road traffic CO₂ emissions and supporting the energy transition, in July 2020 the European retail station operator AVIA opened, by its AVIA member Osterwalder AG St. Gallen, its first hydrogen filling station worldwide, in Switzerland. AVIA is convinced that hydrogen will play an important role as an energy source for mobility in the future and decided to step forward to help reduce carbon emissions produced from the road traffic. The newly opened station offers, to commercial vehicles in first instance, but also to passenger cars, green hydrogen with zero CO₂ emissions, made in Switzerland using 100% renewable energy. By supporting this sustainable form of electro-mobility, AVIA is making an important contribution towards achieving CO₂ targets for road transport.

TO KNOW MORE [READ HERE](#) ▶

COUNTRY • SWITZERLAND
COMPANY • AVIA

Avia's First Hydrogen Station Worldwide





POLICY REPORT



TRANSPORT & FUELS

– Sustainable and Smart Mobility Strategy

Expert: JOHAN DELEU, Sustainable transport

Published on 9 December 2020, the Sustainable and Smart Mobility Strategy, which was announced as part of the European Green Deal, defines a series of flagship actions and milestones for the European transport sector's transition towards achieving the EU's objectives of a sustainable, smart and resilient mobility. The Strategy is dedicated to outlining a combination of policy measures that can deliver at least a 90% reduction of GHG emissions by 2050 compared to 1990 levels.

In particular, it outlines concrete policy actions for boosting the uptake of zero-emission vehicles, renewable & low-carbon fuels and related infrastructure, creating zero-emission airports and ports, greening freight transport through modal shift, pricing carbon and providing better incentives for users.

UPEI welcomed the publication of the Strategy, as it gives some clarity on future policies meant to drive the transformation of the transport sector towards climate neutrality. In particular, we support the recognition of the need to boost renewable and low-carbon fuels for road, waterborne, air and rail transport, without further delay, for deployment on a large scale, and provide signals on the value of these fuels. We regret however that the potential of these options to reduce emissions from road transport alongside electricity and hydrogen is understated. Our sector will play a crucial role in supplying the energy in Europe allowing to reduce emissions in all modes of transport.

As UPEI we have been active on the elaboration of the Strategy by providing [feedback](#) and developing position papers. In particular, we published a [joint position](#) with like-minded sectorial associations urging the European Commission to fully harness alternative fuels with a proven track record of availability, efficiency, and cost-effectiveness in the Strategy.

We will stay ready to further engage with EU institutions to identify the best policy means of incentivising sustainable fuels for all modes of transport, in order to effectively and cost-efficiently decarbonise the sector.

UPEI'S ENGAGEMENT ACTIVITIES 2020

18

BILATERAL MEETINGS

with European Institutions



10

JOINT INITIATIVES

with Industry Partners



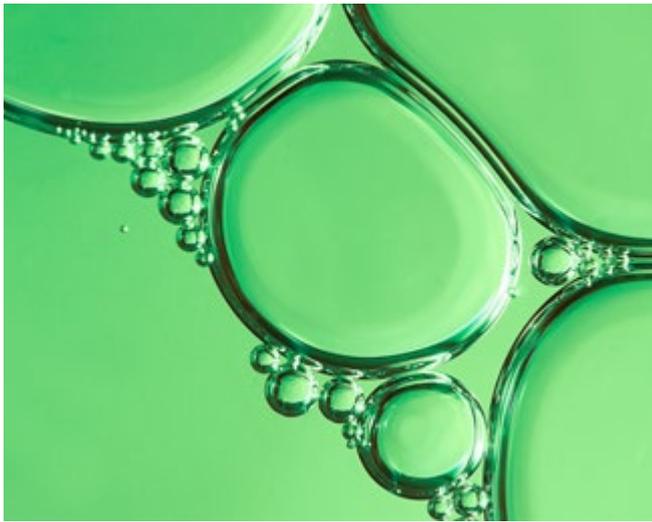
37

CONFERENCES SEMINARS WORKSHOPS

10

STAKEHOLDERS
we interacted with





– Post 2020 CO₂ Emissions Standards for vehicles

Expert: JOHAN DELEU, Sustainable transport

UPEI provided initial [feedback](#) to the roadmap on the Regulation setting CO₂ emission standards for cars and vans, by warning that overall emission reductions from road transport cannot be achieved simply by improving the performance of new vehicles. The vast majority of the 313 million vehicles already on EU roads run on petrol and diesel. According to ACEA statistics, 97% of new car sales in 2019 were vehicles with Internal Combustion Engines (ICE), which will stay on the road for 11+ years.

UPEI sees the amendment of the Regulation setting CO₂ emission standards for cars and vans as a timely opportunity to implement a truly technology neutral approach by including the contribution to emissions reduction achieved using sustainable renewable fuels. Together with a group of 39 associations and companies representing crucial parts of the automotive, fuel and energy sectors we sent a [joint letter](#) calling on the European Commission to include sustainable renewable fuels in EU mobility legislation. We argued that it is paramount to recognise and include the renewable fuel dimension in the revision of the CO₂ emissions standard regulation for vehicles. The recognition should happen through a new mechanism that encompasses the contribution of sustainable renewable fuels when determining manufacturers compliance with their CO₂ emission targets. Leveraging on the CO₂ emissions reduction only at tailpipe level is not sufficient to ensure the shift to carbon neutral mobility. Without the contribution of sustainable renewable fuels, the CO₂ emissions from the EU fleet will not be reduced fast enough to meet the target in 2030 and towards net-zero objective in 2050.

– Renewable Energy Directive

Expert: UTA WEISS, Fuel quality and biofuels

UPEI provided initial [feedback](#) to the roadmap on the Renewable Energy Directive (REDII). We called upon the European Commission to raise the overall level of ambition by expanding the scope of the Directive without questioning previously agreed principles, which would undermine the much-needed regulatory stability for investments.

UPEI also flagged that the way the REDII allows the use of multipliers may lead to a situation where the actual, physical share of renewable electricity and sustainable biofuels remains rather limited, and to distortions of competition between different solutions. Current blending walls in the Fuel Quality Directive should be lifted alongside the review of REDII, to stimulate higher renewable content in fuels. Generally, the Directive should not restrict any opportunity to develop renewable energies, since strong sustainability and Indirect Land Use Change (ILUC) criteria are now in place. The majority of low-carbon and carbon-neutral fuels, such as advanced biofuels, e-fuels, and to a smaller extent hydrogen, e-gas and biogas, can be swiftly deployed thanks to the repurposing of the existing distribution infrastructure. The efficiency gain related to the availability of this infrastructure should be duly considered.

UPEI also contributed to the evaluation of the Annex IX Feedstock list, highlighting the inclusion of new feedstocks on the Annex IX list should not deviate from the agreed set of criteria as listed in Article 28 (6) of the REDII. These criteria are fundamental for current investors and possible new investors that need to consider their investment decisions. The most important reason is that a number of companies have invested or are looking to invest to convert Annex IX feedstocks into advanced renewable fuels. The size of these investments is substantial, hence investors need to rely on the pre-established criteria to enable them to make sound business decisions and to have investment certainty in the projects that they invest in.

– Fuel Quality Directive

Expert: UTA WEISS, Fuel quality and biofuels

The European Commission Directorate-General for Climate Action (DG CLIMA) commissioned the consultancy Ricardo to undertake a pilot study for the technical assessment of transport fuel quality parameters. In parallel, DG CLIMA has contracted Technopolis Group, COWI

and Exergia to evaluate Article 7a of the Fuel Quality Directive (FQD) and assess approaches to reduce further greenhouse gas emissions from transport fuels.

UPEI was consulted for these two studies. Thanks to the feedback provided by its members, UPEI highlighted current challenges faced by the independent fuel suppliers regarding the GHG emission reduction target, such as:

- » Fragmentation of the fuel market
- » Technical barriers to high blending rates
- » Competition issues and diverging definitions of obligated parties
- » Disproportionate impact on smaller companies e.g. admin burden, penalties

We also emphasized the inconsistencies between REDII and FQD, which limit emission reduction potential.

UPEI engaged in discussions with DG CLIMA on operational issues at national level related to the access to Upstream Emission Reduction certificates, the availability and technical barriers to the deployment of biofuels and alternative fuels, the penalty systems and the competition with integrated companies.

Moreover, UPEI conveyed concerns about the deadline (1 May, or 1 June for low ambient temperature countries) for meeting the winter/summer grade transition set by the FQD, calling for a pragmatic approach. Indeed, COVID-19 restrictions had a critical impact on gasoline sales volumes, leading to practical issues with meeting the deadline in 2020. Consequently, in light of the exceptional circumstances, and taking note of the initiatives taken or to be taken by Member States to manage the depletion of existing stocks of winter gasoline, the European Commission announced on 17 April 2020 its decision to refrain from launching infringement procedures as long as that non-conformity is limited in duration, revising the deadline for the transition which could be decided by Member States.

– Deployment of Alternative Fuels Infrastructure

 **Expert: JOHAN DELEU, Sustainable transport**

On 6 April 2020, the European Commission released the inception impact assessment and the [public consultation on the Alternative Fuels Infrastructure Directive \(AFID\)](#). The Commission intends to stimulate the uptake of alternative fuels and infrastructure with the goal of decarbonising the transport sector so that it can fully contribute to the Green Deal's climate neutrality goals. The Commission plans to increase the number of recharging and refuelling points, to ensure interoperability of infrastructure, to ensure that the revised AFID helps provide adequate information for consumers, including information on location, accessibility, prices, payments and compatibility of fuels and recharging infrastructure, and to stimulate the uptake "smart recharging infrastructure".

In its response to the questionnaire and when engaging with EU representatives, UPEI consistently argued that the review of the Directive needs to overcome a lack of demand-side measures, market barriers, and ensure a level-playing field. Moreover, we pointed out the lack of synergies with other pieces of legislation in the field of climate, taxation, and energy. UPEI also argues that the revised Directive will have to promote a gradual transition and better endorse the use of drop-in alternative renewable fuels.

Supporting the necessary diversification of Europe's fuel pool, UPEI stressed the need to keep open all options available for every fuel that contributes to the decarbonisation of transport from a life-cycle perspective. Some of today's alternative fuels will be progressively blended and replaced by renewable-based equivalents, hence



it is important to keep developing their distribution infrastructure.

As the EU reframes important environment and energy legislation under the European Green Deal, it should not abandon clean, proven and cost-effective solutions such as sustainable renewable fuels and LPG. That's the message we conveyed with a [joint declaration](#) signed by a broad coalition of vehicle manufacturers and alternative-fuel producers and suppliers.

– European Sustainable Transport Forum (STF)

The European Commission Director-General for Mobility and Transport (DG MOVE) has prolonged the mandate for UPEI membership to the STF until 31 December 2022. In 2020, the Forum developed "Recommendations for procuring, awarding concessions and granting aid for recharging points", a detailed report which aims to provide practical guidelines for public authorities intending to procure recharging infrastructure, or to award concessions for their roll-out and/or operation, and discussed standards and upcoming AFID review. By providing an overview of innovative best practices, the STF aims to develop a set of minimum recommendations for public authorities seeking to support the deployment of recharging infrastructure.

– Fuel Price comparison

Experts: JOHAN DELEU, Sustainable Transport
SARAH SCHMITT, Retail Sector

2020 witnessed developments under the Programme Support Action on the implementation of Article 7.3 of Directive 2014/94/EU, which UPEI welcomed as a way to guarantee a harmonised approach to the implementation of the common methodology across European Member States.

On 8 September 2020, the recommendations for the implementation of the Fuel Price comparison (FPC), which aims to provide information on fuel prices to allow consumers to compare between the fuel/running costs (euros/national currencies per 100 km) of vehicles with different fuels, were presented.

UPEI views, also expressed at the national level thanks

to UPEI members' action, have been taken into account. As a result, final recommendations are practical, leaving choice to station operators and exempting the smallest stations, and the costs entailed are expected to be very limited. UPEI and its membership supported the recommendations and are committed to remain active at national level on the implementation.

– E-fuels and sector integration

Expert: MATTHIAS PLÖTZKE

On 8 July 2020, the Commission released the Energy System Integration and the Hydrogen strategies. The Commission views the two strategies as instrumental in putting Europe on the right path towards climate-neutrality, tackling the short-term consequences of the COVID-19 crisis and ensuring that all the future investments in hydrogen and system integration are geared towards the Green Deal objectives.

UPEI welcomed both strategies, as they not only seek to create synergies across the European economy, but also to embrace a rapidly developing hydrogen sector and its underlying sustainable value chains. We also organised a series of meetings with European institutions represent-





atives to express UPEI views. There is no silver bullet on the road to climate neutrality, so we remarked that developing synergies in various parts of the European economy will be crucial in reaching this ultimate goal. We therefore welcomed that the System Integration Strategy holistically identifies the many challenges that various sectors face in reaching greater circularity and energy efficiency levels.

We then particularly appreciated that the Hydrogen Strategy seeks to set out extensive means of reaching massive volumes of renewable and low-carbon hydrogen. However, we highlighted that hydrogen shall not be seen as an end-product, but also as a feedstock for the production of a wide-range of synthetic fuels.

Together with 14 associations, UPEI also co-signed a [joint industry letter](#) emphasizing the paramount importance of a European Hydrogen Strategy for competitive industrial value chains and the fight against climate change. The strategy would be the basis for a common vision of the role of hydrogen, derived fuels, gases and raw materials in our society, in international trade, for Europe's industrial strength and its global leadership in climate protection measures.



PAYMENT SOLUTIONS

Expert: ONDŘEJ JANČAŘÍK, Fuel Cards

The work of the UPEI Fuel Payments Commission through 2020 focused mainly on the analysis and implications of the Vega International case law. The Court of Justice of the European Union delivered its judgment on intercompany recharges made for fuel purchased through fuel cards, considering that there is no chain of supplies of fuel in such case, but rather considered as a service of granting credit. UPEI and its membership accepted the decision of the Court, but stressed that the case described in the Vega example cannot apply generally, as it represents a peculiar business model, different from the one of fuel cards issuers.

UPEI therefore raised the awareness of the European Commission of the potential impact of this decision if interpreted broadly, which could question fuel card issuers business model potentially leading to raises in prices and subsequent risks for the business, especially for SMEs. UPEI recommended its members to keep engaging with Member States, informing them about the features of the business model and spreading the message that Member States do not need to change the VAT regime and its application to fuel cards following the ruling.



TAXATION

Expert: INGA TÖLKE, Taxation

– Energy Taxation Directive

On 4 March 2020, the Commission published a [roadmap on the Revision of the Energy Taxation Directive \(ETD\)](#). According to the inception impact document, the Commission wants to tackle the persistence of fossil fuel subsidies, the ETD being outdated and not in line with the EU policy objectives (such as promotion of alternative fuels, GHG reductions, and energy efficiency) and the irrelevance for the internal market due to its lack of real added value and loss of effect.

The first objective of the review of the ETD is aligning taxation of energy products and electricity with EU energy and climate policies with a view to contributing to the EU 2030 targets and climate neutrality by 2050 in the context of the European Green Deal. In addition, also preserving the EU internal market by updating the scope and the structure of rates as well as by rationalising the use of optional tax exemptions and reductions by Member States.

On 23 July 2020, the European Commission then launched a public consultation. The results of this consultation will feed into the preparatory work for the review of the ETD, to be launched in June 2021.

UPEI members currently face barriers to trade and distortion of competition due to the fact that the current ETD is applied in a too diversified way across Member States. Through our response, we called for a clearer structure at EU level, based on a common methodology and data. We proposed that minimum tax rates for energy products are set based on their energy content (rather than on its volume or mass) and greenhouse gas emissions. Moreover, the chosen approach should be applied, in principle, to all energies and all uses. Member States should be responsible for avoiding potential social side-effects negatively impacting certain categories of the population, or addressing sector specific issues, through incentives, support measures etc.

– EU Emissions trading system

In general, UPEI supports the EU Emissions Trading Scheme (EU ETS) as a market-based and cost-effective tool to reduce GHG emissions, in light with the EU carbon neutrality objective. We see the ETS and Effort Sharing Regulation as complementary measures to address climate change.



In principle, the ETS applies to the organisations directly responsible for the actual CO₂ emissions. Such an approach should be taken when extending the ETS to the maritime sector, by subjecting shipping companies to ETS obligations, in line with the existing Monitoring, reporting and verification (MRV) Regulation. However, we understand that the same approach cannot be fully implemented in the road transport and building sectors, given the very high number of emitters.

In 2020 UPEI [advocated](#) for concrete suggestions regarding the prospect of expanding the use of emissions trading to buildings and road transport, starting from a coherent policy framework, a suitable identification of the market players, as the independent fuel supply sector is a complex chain, involving many distinct players including small companies, to a technology neutral approach and a proper assessment of potential effect on prices. The building heating and transport sectors have a low-price elasticity of demand, since behavioural changes are often limited by the lack of suitable alternatives and high conversion costs, including non-monetary costs.

– Customs & excise

The Customs and Excise Duties Working Group (CEDWG), constituted by FETSA (Federation of European Tank Storage Associations), FuelsEurope (European Petroleum

Refiners Association) and UPEI, addressed the European Commission Directorate General Taxation and Customs Union (DG TAXUD) regarding the Council Directive (EU) 2020/262 of 19 December 2019 laying down the general arrangements for excise duty, explaining the issue of transport losses related to loading/discharging and the evolution of different thresholds/tolerances in these movements.

The group appreciated that partial losses due to the nature of the goods that occur during a duty suspension movement between Member States shall not be considered a release for consumption, as far as the amount of loss falls below the common partial loss threshold for those excise goods (Art. 6 (7)).

In their [joint letter](#), the associations explained why tolerances are needed in order to reduce administrative burden for both customs authorities and economic operators. Tolerances are to be applied in measurements taken when products are loaded and discharged, due to the inherent nature of the bulk liquids that are transported, where it is clear that the differences in numbers are not caused by the consumption of the product. We called on several characteristics to be considered in determining realistic thresholds for energy products, so that these thresholds could reflect the specifics of the bulk transports of energy products and consequently ease the handling of transport losses for both customs administrations and economic operators.



BUNKERING / MARINE FUELS

Expert: ERIK DE VRIES, Maritime Transport

As part of a package to bring the maritime sector in line with the EU's ambition of climate-neutrality by 2050, the FuelEU Maritime initiative aims at increasing the use of sustainable alternative fuels in European shipping and ports. UPEI participated in the [consultation](#) launched in July 2020 by welcoming the inclusion of demand-side measures, which will be critical for the effective deployment of sustainable alternative fuels (SAF), and warning at the same time against a regulatory patchwork by which several pieces of legislation would set out diverging measures to respond to a similar policy objective, as experienced in the road transport sector.

UPEI also welcomed the reference to well-to-wake as a basis for assessing the performance of different technologies. In parallel, we called for strong sustainability criteria to be established for all technology solutions, in line with REDII. Furthermore, UPEI engaged with the European Commission sharing the views of the European independent bunker suppliers, focusing on the general fragmentation of the European bunkering market and the price elasticity in the bunkering sector, as global ports compete against each other and ships have considerable flexibility in where they lift bunkers as long, highlighting the risk of carbon leakage. This risk is increasingly higher now the UK (and Gibraltar) have left the EU.

To support its members facing issues in declaring compliance with the conditions for bunker fuel VAT exemption, UPEI also collected information based on current practices in different EU markets, and developed a [template form](#) to be used by companies when needed.



HEATING

**Experts: BRIAN WORRALL, Heating Oil
UTA WEISS, Fuel quality and biofuels**

On 11 June 2020, the Commission released a [public consultation on the Renovation Wave initiative](#), which aims at optimising building renovation across the bloc, including by encouraging investment and financing.

In its response, UPEI encouraged the replacement of old, inefficient heating systems with new systems, using primary energy savings and CO₂ emission reduction as the main parameters for EU and national legislation,

leaving a free choice of technologies for citizens based on their preferences. We argued it is essential to promote all technologies that can make clear efficiency and emission improvements in heating systems, including boilers that support renewable liquid fuels.

UPEI also co-signed a [position paper](#) together with the other three associations active in the heating oil industry, namely ECFD (European Confederation of Fuel Distributors), Eurofuel (European Heating Oil Association) and FuelsEurope (European Petroleum Refiners Association), expressing concerns regarding some of the proposals of the Renovation Wave questionnaire, and in particular the proposals to "ban the sale or use of fossil fuel heating systems by a certain date" for residential or non-residential buildings, or to "replace old boiler by a heat pump". These proposals are in full contradiction with the principle of technology neutrality which has been repeatedly confirmed in the European Union's climate and energy policy. On 14 October 2020, the European Commission has then published its [Renovation Wave Strategy](#).

As part of the Joint Heating Commission, formed by the above mentioned associations, we have reflected further on the potential for liquid fuels to contribute to the EU's energy and climate policy objectives in 2030, 2050 and beyond and summarised our conclusion in the [brochure "Heating with liquid fuels"](#). In order to keep the transition affordable and avoid energy poverty, it is important that climate policy remains technology neutral, allowing for upgrades to more efficient and hybrid heating oil systems, while pushing innovation by industry into the development of sustainable alternatives.



STANDARDISATION

Expert: UTA WEISS, Fuel quality and biofuels

UPEI is part of the CEN/TC 19 technical committee, dealing with gaseous and liquid fuels, lubricants and related products of petroleum, synthetic and biological origin, and plays an active role in the working groups on specification for unleaded petrol (21), specification of distillate fuels (24) and on new fuels (38).



UPEI RESPONSE TO COVID-19

To respond to the COVID-19 outbreak and its challenges while continuing to enable and deliver value-creating opportunities, UPEI explored alternative digital strategies and implemented a number of tactical steps to adapt its programmes, establish and expand virtual collaboration, and other strategic actions in order to guarantee exchange of information between UPEI members.

In the midst of the first wave of the COVID pandemic, UPEI continued to support its members by acting as a hub for information and best practices sharing. For instance, by offering an information exchange platform where to share concrete national measures implemented by Member States to counteract the effects of the COVID situation (e.g. the use of masks in retail stations, measures taken by European governments in the field of taxation, etc.), collecting information on national markets resilience and the impact of the pandemic at countries level, while constantly updating UPEI members on the latest State Aid rules aiming to help overcome the situation triggered by the COVID outbreak.

UPEI further strengthened its online presence by organising online meetings and events, using also interactive and collaborative tools, with the aim to facilitate the communication between and to UPEI members, giving them the opportunity to discuss and agree on internal matters regarding the association, network with their peers, receive information on key policy developments at EU level and discuss the strategic priorities for advocacy action.

The related travel restrictions caused by the COVID crisis forced UPEI to replace both its 2020 Spring and Autumn General face-to-face meetings and related events by webmeetings. In the context of UPEI Autumn General Meeting, UPEI organised its first "Virtual networking" session, where UPEI members shared recent developments (e.g. market, technical, regulatory developments) about their markets, which could potentially inspire others or spill over to other countries.





UPEI BUSINESS PARTNERSHIP

In the ongoing energy transition towards a low carbon economy, UPEI had identified the increasing importance – for companies and fuel businesses – of having a strong presence in Brussels and access a wide range of expertise from within the independent energy sector as well as related sectors. In order to respond to this need, in 2017 UPEI has launched its Business Partnership (BP), with the aim to include forward thinking companies who are directly or indirectly involved in the fuel supply business and who support UPEI mission.

In 2020 UPEI engaged with 17 Business Partners (BPs), offering several opportunities to learn about the latest European policy developments, join meetings with guest speakers and key players in the industry, meet their peers and extend their network.



UPEI BUSINESS PARTNERSHIP

THE OFFER

While supporting UPEI mission, companies involved in the partnership have several opportunities to learn about the latest European policy developments, join meetings with guest speakers and key players in the industry, meet their peers and extend their network.

TO BE ON TOP OF POLICY DECISIONS SHAPING EU ENERGY MARKET...

UPEI BUSINESS PARTNERSHIP IS THE ANSWER

UPEI covers a wide spectrum of downstream activities. To address topics and issues that affect the business, we work through several Commissions, one for each of the main business activities of the UPEI membership.

MARKETING COMMISSION	HOPPING / FILLING / FILLING COMMISSION	RETAIL STATIONS COMMISSION	FUEL PAYMENTS COMMISSION
• Distribution • Fuel quality • Fuel quality • Fuel quality • Fuel quality • Fuel quality	• Fuel quality • Fuel quality • Fuel quality • Fuel quality • Fuel quality • Fuel quality	• Fuel quality • Fuel quality • Fuel quality • Fuel quality • Fuel quality • Fuel quality	• Fuel quality • Fuel quality • Fuel quality • Fuel quality • Fuel quality • Fuel quality

CONTACT: info@upei.org

• approx. 8 meetings / Commission per year

PROGRAMME & NEWS 2021

As part of the Business Partnership, UPEI is pleased to show an overview of the activities for 2021 and the new opportunities offered to its partners.

- NEW! UPEI Commission meetings**
Attend together with the UPEI membership and Commission meetings depending on the most relevant topics for your company, gaining new insights and information on the legislative context.
- NEW! UPEI website & hoc communications**
Full access to the Member's only area of UPEI website, with the latest news, strategic analysis of the main legislative developments and their impact on the sector, UPEI members directory & other information.
- NEW! Free advertisement opportunities**
Advertise your company on our monthly newsletter, your logo in a special focus on your company on a rotating basis on our website.
- UPEI conferences & meetings (online or face-to-face)**
Based at the events organized by UPEI in the sector on policy issues and priorities of the 1st annual UPEI General Meeting, an opportunity to hold strategic decisions with like-minded companies active across Europe.
- Networking events**
Take part in events sponsored by UPEI and sector of hoc initiatives & discounts to other industry events where you can expand your network.

FOR MORE INFORMATION contact UPEI Secretariat at info@upei.org

Follow us on [Twitter](#) and [LinkedIn](#)

MEMBERS' NEWSLETTER

NEWS FROM BRUSSELS

SPECIAL EDITION

NEWS FROM BRUSSELS

COMMISSION RELEASES ITS 2021 WORK PROGRAMME

On 20 October, the Commission has released its Work Programme 2021, which includes a Communication and four Annexes (see [link](#)).

It is composed of new initiatives, fitness checks (REFIT), priority pending initiatives, and withdrawals.

– 2021 Commission work programme –

The Commission will be focusing on overhauling relevant climate and energy legislations next year, especially in light of the intention to reduce GHG emissions by at least 55% by 2030. To this end, the "Fit for 55 Package", expected by June 2021, will include new legislative proposals on renewable energy efficiency, buildings, land use, energy taxation, effort sharing and emissions trading, as well as methane emissions.

15-16/10/2020 EUROPEAN COUNCIL CONCLUSIONS

On 15 and 16 October, the European Council Summit took place in Brussels.

SEE OUR **BUSINESS PARTNER PROGRAM 2021**

SEE **SPECIAL NEWSLETTERS** WITH BP ADVERTS

Newsletter **April**

Newsletter **October**

UPEI MEMBERS ONLY

UPEI CIRCULARS

13 03.04.2020 UPEI 2019 financial results

14 17.03.2020 Fuel Quality Directive - Notice on the application of article 3 of directive 78/759/EEC with regard to the maximum vapour pressure for petrol

15 21.04.2020 UPEI Spring web meeting 2020 - Draft Minutes

16 27.04.2020 UPEI Board Meetings 11/02/2020 - 01/04/2020 - Decisions

DIARY

April 2020

1 UPEI Board Meeting - web

2 Retail Stations Commission Meeting - UPEI Spring General Meeting

3 UPEI Spring General Meeting

23 Banking Commission - web meeting

TAKING A STANCE TOWARDS CLEANER MOBILITY

At EUROWAG, we feel responsible to actively contribute to the transformation of traditional road transportation towards a more sustainable future. To do so, we proactively support our customers and business partners with the transition towards clean mobility.

We invite all the players in the market to join our initiative towards a cleaner and more sustainable mobility in Europe!

Download OUR position paper here and stay tuned!

[DOWNLOAD](#)

EVENTS

20 JANUARY 2020

LNG AND THE EU GREEN DEAL: TEAMING UP FOR A DECARBONISED 2050

Cécile Nourigat moderator



19 AUGUST 2020

FUTURE OF LIQUID HEATING FUELS IN A CARBON-CONSTRAINED WORLD – POLICY SESSION

Cécile Nourigat and Uta Weiss speakers



19 AUGUST 2020

OIL & NON OIL 2020

Cécile Nourigat speaker





UPEI PUBLICATIONS ISSUED IN 2020

PUBLICATIONS

- » Factsheet “Bunkering: facts & figures”
- » UPEI position paper “Avoiding regulatory inconsistencies in future policy frameworks”

STATEMENTS

JANUARY

- » Getting to the Green Deal: Don't rule out alternative fuels with a track record of success

FEBRUARY

- » UPEI Feedback: European climate law – achieving climate neutrality by 2050

MARCH

- » European Climate Law – A clear signal to market operators

APRIL

- » UPEI Feedback: FuelEU Maritime initiative

MAY

- » UPEI Feedback: Smart Sector Integration Strategy
- » UPEI Feedback: Evaluation of Renewable Energy Directive Annex IX feedstocks
- » Joint letter on Thresholds for transport losses of energy products during duty suspension procedures

JUNE

- » EU Recovery Instrument – A step towards a sustainable economic recovery

JULY

- » Joint industry letter: 5 Principles for a EU Hydrogen Strategy
- » Joint Position - Renovation Wave initiative

- » System Integration and Hydrogen Strategies – positive steps towards carbon neutrality
- » UPEI Feedback: Sustainable and Smart Mobility Strategy

SEPTEMBER

- » UPEI Feedback: Renewable Energy Directive (RED) roadmap
- » UPEI Feedback: Energy Efficiency Directive (EED) roadmap

OCTOBER

- » UPEI Press Release: UPEI holds presiding Board elections
- » Joint Position on existing alternative fuels within the Sustainable and Smart Mobility Strategy

NOVEMBER

- » UPEI Position Paper: Revision of the EU Emissions Trading System and the EU Effort Sharing Regulation
- » UPEI Feedback: Inception Impact Assessment – Amendment of the Regulation setting CO₂ emission standards for cars and vans
- » Joint letter on the inclusion of sustainable renewable fuels in the EU mobility legislation

DECEMBER

- » UPEI Press Release: Supplying energy for a Sustainable and Smart Mobility in Europe

CONSULTATIONS

JUNE

- » Alternative Fuels Infrastructure Directive review
- » 2030 Climate Target Plan

JULY

- » Renovation Wave Initiative

SEPTEMBER

- » Sustainable and Smart Mobility Strategy

OCTOBER

- » Revision of the Energy Taxation Directive

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2020 UPEI ANNUAL REPORT

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